

**STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES, *ex rel.* KRAH PLUNKERT,**

**Plaintiffs,**

**v.**

**Civ. No. SAG-19-3375**

**MARYLAND BROADBAND COOPERATIVE, *et al.*,**

**Defendants.**

**JOINT MOTION TO DEFER DISMISSAL WITH PREJUDICE**

The parties through counsel jointly move to defer the dismissal with prejudice of this proceeding for fifteen (15) days on these grounds:

1. This matter was conditionally dismissed without prejudice March 20, 2024. That dismissal would become a dismissal with prejudice April 19, 2024, if not deferred for cause.
2. Since then, the parties have been working diligently and in good faith to develop appropriate documentation of their agreement but require additional time to complete that process.
3. Deferring dismissal with prejudice fifteen days, until May 4, 2024, will accommodate the parties, prejudice no one, and cause no undue delay.

WHEREFORE, it is respectfully requested this Honorable Court defer dismissal with prejudice of this proceeding until May 4, 2024.

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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MARYLAND BROADBAND COOPERATIVE, *et  
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Defendants.

**Civ. No. SAG-19-3375**

**ORDER**

It is ORDERED, this \_\_\_\_\_ day of April, 2024, by the United States District Court for the District of Maryland, that the parties' joint Motion to Defer Dismissal with prejudice is GRANTED, and dismissal with prejudice is accordingly deferred until May 4, 2024.

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Honorable Stephanie A. Gallagher  
United States District Judge